

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
vs.) NO. 04-30046 MAP
)
ANTHONY MATOS)

MOTION TO MODIFY CONDITIONS OF BOND

Now comes the defendant, by and through counsel, and respectfully requests this Honorable Court modify his conditions of bond to permit his moving from 42 Justina Circle in Ludlow, MA to 1085 Sumner Avenue in Springfield, MA.

As grounds for this request the defendant states that his wife is selling the property where they currently reside, 42 Justina Circle. The parties will be moving to 1085 Sumner Avenue on September 30, 2006 in order to permit the premises to be shown and advertised for sale.

The defendant is currently monitored by Electronic Monitoring and has been monitored without incident for almost 2 years. The defendant has plead guilty and is scheduled for Sentencing on October 16, 2006.

WHEREFORE, counsel for the defendant moves his conditions be modified to terminate Electronic Monitoring and to permit defendant's change of address.

Counsel for the defendant has conferred with AUSA Todd Newhouse who does not oppose this modification.

Respectfully submitted,
THE DEFENDANT

BY: /s/ Vincent A. Bongiorno, Esq.
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CERTIFICATE OF SERVICE

I, Vincent A. Bongiorno, Esq., do hereby certify that I have served a copy of the foregoing via CM/ECF to the Assistant United States Attorney, Todd Newhouse, Esq., United States District Court, and Irma Zignorelli, Pretrial Services, 1550 Main Street, Springfield, MA. 01103 this 25th day of September 2006.

/s/ Vincent A. Bongiorno